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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:17-CR-00321-SI

Plaintiff,

DEFENDANT'S

SENTENCING MEMORANDUM

vs.

ANTHONY WAYNE TAVOLONI, JR.,

Defendant.

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The defendant, Anthony Tavoloni, through his attorney Conor Huseby, hereby submits the following sentencing memorandum for the Court's review and consideration in determining a reasonable sentence that is "sufficient, but not greater than necessary," as required by 18 U.S.C. § 3553(a). A sentencing hearing is currently scheduled before the Honorable Judge Michael H. Simon on September 12, 2018.

On May 21, 2018, Mr. Tavoloni pleaded guilty to two counts of Assaulting, Resisting, or Impeding Certain Officers or Employees in violation of 18 U.S.C. § 111(a)(1). Mr. Tavoloni has since reviewed the Presentence Investigation Report (“PSR”) with defense counsel and has no objections to the PSR. The probation department is recommending a variance from prison to three years of probation with six months of home detention. It is anticipated that the government will join the probation department and urge the Court to sentence Mr. Tavoloni to probation with six months of home detention as well.

Pursuant to information that will be provided to the Court in a confidential supplement to this memorandum, Mr. Tavoloni will also ask the Court to sentence him to probation. However, Mr. Tavoloni will ask the Court not to impose a home detention condition on him, because, based on Mr. Tavoloni’s exemplary conduct while on pretrial release, the defense does not believe further home detention is necessary or serves any further sentencing purpose.

RESPECTFULLY SUBMITTED this 30th day of August, 2018.

/s/ Conor Huseby

Conor Huseby  
Attorney for Defendant